

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

Case: 3:23-MC-38

|                                 |   |                              |
|---------------------------------|---|------------------------------|
| UNITED STATES OF AMERICA        | ) |                              |
|                                 | ) |                              |
| v.                              | ) | CONSENT MOTION FOR EXTENSION |
|                                 | ) | OF TIME TO FILE FORFEITURE   |
|                                 | ) | COMPLAINT                    |
| APPROXIMATELY \$1,199,530.00 IN | ) |                              |
| UNITED STATES CURRENCY          | ) |                              |

NOW COMES Plaintiff, the United States of America, by and through Dena J. King, United States Attorney for the Western District of North Carolina, pursuant to 18 U.S.C. § 983(a)(3)(A), and hereby requests that this Court extend, for ninety days, the deadline for filing a Complaint for Forfeiture *In Rem* in this matter. In support of this Motion, the Government submits as follows:

On or about August 17, 2021, the DEA seized \$1,199,530.00 from an individual in North Bergen, New Jersey who the United States alleges was involved in an unlicensed money transmitting business, in violation of 18 U.S.C. § 1960, with a Western District of North Carolina resident identified herein as JW. Following extensions of the administrative forfeiture notice deadline, the Government initiated an administrative forfeiture action against the funds. JW, acting through counsel Brian Cromwell, filed a Claim requesting judicial forfeiture of the Currency. The deadline to file a Complaint is March 19, 2023.

Undersigned counsel for the United States and counsel for JW are engaged in pre-filing discussions in this matter. In light of the discussions, JW and the United States will consent to

an extension of ninety days to file a complaint. Such an extension would facilitate completion of pre-complaint discussions.

Under such circumstances, Section 983(a)(3)(A) grants this Court authority to grant an extension.

WHEREFORE, for the reasons set forth herein, for good cause shown, and so that the parties may engage in pre-complaint informal discovery, and without objection by the only administrative forfeiture claimant to the property, the United States respectfully requests that this Court issue and Order for Extension in the form submitted herewith, granting a ninety day extension to file any civil forfeiture complaint, until and including Monday, June 19, 2023, as the ninety day mark falls on Saturday, June 17, 2023.

Respectfully submitted this 13<sup>th</sup> day of March, 2023.

DENA J. KING  
UNITED STATES ATTORNEY

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